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7	Attorneys for Complainant	
8	BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA	
9		
10	STATE OF C	
11	In the Matter of the Accusation Against:	Case No. 2011-1013
12	CANDACE LYNN GERONILLA, a.k.a.	
13	CANDACE JOHNSON, a.k.a. CANDACE RAMIREZ, a.k.a. CANDACE MURIEL	ACCUSATION
14	8000 W. Spring Mt. Rd. #1025 Las Vegas, NV 89117	
15	Registered Nurse License No. 590777	
16	Respondent.	
17		
18	Complainant alleges:	
19	<u>PARTIES</u>	
20	1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her	
21	official capacity as the Executive Officer of the Board of Registered Nursing, Department of	
22	Consumer Affairs.	
23	2. On or about November 5, 2001, the Board of Registered Nursing issued Registered	
24	Nurse License Number 590777 to Candace Lynn Geronilla, also known as Candace Johnson, als	
25	known as Candace Ramirez, also known as Candace Muriel (Respondent). The Registered Nurse	
26	License was in full force and effect at all times relevant to the charges brought in this Accusation	
27	and will expire on October 31, 2011, unless renewed.	
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JURISDICTION

- 3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.
- 4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b), of the Code, the Board may renew an expired license at any time within eight years after the expiration.
- 6. Section 118, subdivision (b), of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

STATUTORY PROVISIONS

7. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

- "(a) Unprofessional conduct, which includes, but is not limited to, the following:
- "(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action."

COST RECOVERY

8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

FIRST CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Out of State Discipline) (Bus. & Prof. Code §2761, subd. (a)(4))

- 9. Respondent has subjected her registered nurse license to disciplinary action under Code section 2761, subdivision (a)(4), in that on or about March 26, 2001, in a disciplinary order issued by the Nevada State Board of Nursing (Nevada Board), the Nevada Board denied Respondent's application for a license as a registered nurse based on her submission of a fraudulent application to the Nevada Board.
- 10. The underlying conduct supporting the Nevada Board's disciplinary order is that Respondent submitted an application for a registered nurse license to the Nevada Board and answered "no" to the question regarding previous convictions, despite having been previously convicted of a misdemeanor.

SECOND CAUSE FOR DISCIPLINE

(Unprofessional Conduct) (Bus. & Prof. Code §2761, subd. (a))

11. Respondent has subjected her registered nurse license to disciplinary action under Code section 2761, subdivision (a), in that Respondent engaged in unprofessional conduct when she was employed on a travel assignment with Mercy General Hospital from June 2002 through October 2002. Specifically, Respondent made fraudulent entries on her travel company timecard and overbilled Mercy Hospital in excess of \$15,000.00.

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<u>PRAYER</u>

WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

- 1. Revoking or suspending Registered Nurse License Number 590777, issued to Candace Lynn Geronilla, also known as Candace Johnson, also known as Candace Ramirez, also known as Candace Muriel;
- 2. Ordering Candace Lynn Geronilla, also known as Candace Johnson, also known as Candace Ramirez, also known as Candace Muriel to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
 - 3. Taking such other and further action as deemed necessary and proper.

DATED: June 29, 2011

LOUISE R. BAILEY, M.ED., RI

Executive Officer

Board of Registered Nursing

Department of Consumer Affairs

State of California Complainant